

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Proposal to Revise Multichannel Multipoint
Distribution Service and the Instructional
Television Fixed Service Rules

RM-10586

To: The Wireless Telecommunications Bureau

COMMENTS OF CARITAS TELECOMMUNICATIONS

Caritas Telecommunications ("Caritas") submits these comments in support of the proposal ("Proposal") submitted by the Wireless Communications Association International, the National ITFS Association, and the Catholic Television Network to change the rules governing the Multichannel Multipoint Distribution Service ("MMDS") and the Instructional Television Fixed Service ("ITFS").¹ The revised rules would result in more streamlined licensing for MMDS and ITFS licensees, encourage the deployment ~~of~~ new wireless broadband services, and enhance the availability and usefulness ~~of~~ educational services across the United States.

Caritas has been an ITFS licensee since 1984. Caritas uses ITFS frequencies to serve the Diocese of San Bernardino, which covers over 27,000 square miles in Southern California. Currently, Caritas provides educational programming to over 25,000 private and public school students in Southern California. Caritas has an extensive curriculum that includes courses in art, languages, math, science, social studies, and religion. In addition, Caritas provides professional

¹ See "Wireless Telecommunications Bureau Seeks Comment on Proposal to Revise Multichannel Multipoint Distribution Service and Instructional Television Fixed Service Rules," *Public Notice*, DA 02-2732 (rel. Oct.17, 2002).

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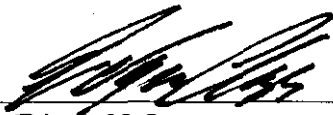
development training to teachers, and courses for adults in areas such as leadership, counseling, continuing education, skills development, and health and human services.

Caritas supports the Proposal because it provides a framework to protect existing ITFS operations while, at the same time, opening up the spectrum for a host of new two-way, interactive broadband services. This is important to Caritas because classrooms are being upgraded to accommodate two-way interactive capabilities. In addition, new training programs are being implemented to teach instructors how to use interactive technology. Once two-way capabilities are implemented, classrooms will be connected to teachers using digital technology, and students will have access to high-speed Internet connections. Teachers and administrators will benefit as well from two-way interactive training and workshops. These new services are vitally important, and will further our ability to serve teachers, students and others in the community.

The Proposal was the result of significant work by numerous ITFS and MMDS licensees, engineers, equipment vendors, and others with differing interests and perspectives. Caritas urges the Commission to move swiftly to issue a Notice of Proposed Rulemaking in response to the Proposal so that others will have an opportunity to comment, and new services can be deployed at the earliest possible time.

Respectfully submitted,

CARITAS TELECOMMUNICATIONS


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November 14, 2002